

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                                      |   |                                   |
|--------------------------------------|---|-----------------------------------|
| PAUL COX, individually and on behalf | ) |                                   |
| of the classes defined herein,       | ) |                                   |
|                                      | ) |                                   |
| Plaintiff,                           | ) |                                   |
|                                      | ) |                                   |
| v.                                   | ) | No. 08C 1005                      |
|                                      | ) |                                   |
| UNIFUND CCR PARTNERS;                | ) | Magistrate Judge Martin C. Ashman |
| CREDIT CARD RECEIVABLES              | ) |                                   |
| FUND, INC., and                      | ) |                                   |
| ZB LIMITED PARTNERSHIP,              | ) |                                   |
|                                      | ) |                                   |
| Defendants.                          | ) |                                   |

**UNCONTESTED / AGREED MOTION TO MODIFY THE BRIEFING SCHEDULE ON  
PLAINTIFF’S MOTION FOR CLASS CERTIFICATION**

Defendants Unifund CCR Partners ("Unifund"), Credit Card Receivables Fund, Inc. ("CCRF"), and ZB Limited Partnership ("ZBLP") file this Agreed Motion to Modify the Briefing Schedule on Plaintiff’s Motion for Class Certification. In support of this motion, Defendants state as follows:

1. Defendants filed their Answer and Affirmative Defenses to Plaintiff’s Complaint on March 31, 2008.
  
2. Defendants’ counsel is currently still working with Defendants and Blitt & Gaines to pull together a sampling of the collection complaints filed in Illinois state courts on Unifund’s behalf by Blitt & Gaines to provide that information to Plaintiff’s counsel and for use in responding to Plaintiff’s Motion for Class Certification.
  
3. Pursuant to the current briefing schedule, set by Magistrate Judge Ashman:
  - a) Defendants’ response brief is due May 28, 2008.
  - b) Plaintiff’s reply brief is due June 11, 2008.

- c) The argument on this motion is currently set to be heard on June 13, 2008 at 10:30 a.m. in front of Magistrate Judge Ashman.

4. Defendants respectfully request that this Honorable Court modify the briefing schedule to extend the current dates by two (2) additional weeks, as follows:

- a) Defendants' response brief would be due June 11, 2008.
- b) Plaintiff's reply brief would be due June 25, 2008.
- c) The argument on this motion would be heard by Magistrate Judge Ashman at the end of June (and/or at a date and time in accordance with the court's schedule).

5. Defendants' counsel spoke with Plaintiff's counsel via telephone and email on May 27, 2008 regarding this motion, and Plaintiff's counsel agreed with this request.

WHEREFORE, Defendants respectfully request that this Court modify the briefing schedule as follows: (a) Defendants' response brief is due on June 11, 2008; (b) Plaintiff's reply brief is due on June 25, 2008; and (c) the argument would be set for a date and time thereafter in accordance with the court's schedule.

Respectfully submitted,

By: /s/ Kathleen A. Kelley  
One of the Attorneys for Defendants

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